

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO, WESTERN DIVISION

BRUCE WOODS, :  
Petitioner, : Case No. 1:00 CV 803  
-vs- : Judge Spiegel  
WANZA JACKSON, WARDEN, : Magistrate Judge Perelman  
Respondent. :

**PETITIONER WOODS' REPLY TO RESPONDENT'S  
RESPONSE TO PETITIONER'S DISCOVERY MOTION**

On April 22, 2004, Respondent filed a Motion to Dismiss, and a response to Petitioner's discovery motion. Both documents rely on the declaration that no further facts need to be developed to find in her favor. Respondent is wrong on both fronts.

On this date (May 7, 2004), Petitioner is filing a memorandum opposing Respondent's Motion To Dismiss. Petitioner's memorandum details why that motion should be denied and demonstrates why Petitioner's motion to depose his trial counsel should be granted. Petitioner incorporates as if fully re-written herein his Memorandum In Opposition To Respondent's Motion To Dismiss. Petitioner respectfully requests that this Court consider Petitioner's Memorandum In Opposition to Respondent's Motion To Dismiss as Petitioner's reply in support of his right to conduct discovery.

Petitioner's discovery motion should be granted and Respondent's Motion To Dismiss should be denied.

Respectfully submitted,

DAVID H. BODIKER  
OHIO PUBLIC DEFENDER

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and

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COUNSEL FOR PETITIONER

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing PETITIONER WOODS' REPLY TO RESPONDENT'S RESPONSE TO PETITIONER'S DISCOVERY MOTION was filed electronically with this Court on the 7th day of May, 2004. By operation of this Court's electronic filing system, notice of this filing will be sent to Respondent's counsel, Assistant Attorney General J. Joseph Bodine, who will be able to access this filing through the Court's on-line system.

/s/ Gregory W. Meyers  
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COUNSEL FOR PETITIONER

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